

October 3, 2024

VIA ECF

Honorable Arun Subramanian

United States District Court Southern District of New York 500 Pearl St.

New York, NY 10007-1312

Susan Rotkis | Partner

D: 602-807-1504

E: srotkis@consumerattorneys.com

The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motions. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 57. SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: October 7, 2024

RE: Juan B. Almanzar v. Santander Bank, N.A. Case No. 1:23-cv-10706-AS Plaintiff's Letter Motion for Leave to File Under Seal Exhibits in Support of Plaintiff's Motion for Partial Summary Judgment

Dear Judge Subramanian,

Pursuant to Section 11(C) of your Honor's Individual Practices in Civil Cases ("Individual Practices"), Plaintiff Juan B. Almanzar ("Plaintiff") submits this letter motion for leave to file under seal Exhibit M in support of Plaintiff's Motion for Partial Summary Judgment.

Exhibit M is a copy of Defendant Santander Bank, N.A.'s ("Santander") internal spreadsheet, a standalone document, which contains a list of all decline reason codes and the description of those decline reason codes and was designated confidential by Santander. While Plaintiff takes no position as to Defendant's designation or whether a confidential designation is necessary, to comply with the Court's Protective Order (Dkt. 31), Plaintiff respectfully requests that the Court grant leave for Plaintiff to file Exhibit M under seal.

Due to the entirely confidential nature of Exhibit M, Plaintiff has filed a placeholder in lieu of a redacted version of this document. This approach ensures the protection of all sensitive information contained within the exhibit while preserving the integrity and confidentiality of the materials at issue.

In accordance with Section 11(C)(i) your Honor's Individual Practices, Plaintiff has met and conferred with counsel for Santander. Counsel for Santander is unopposed to Plaintiff's Motion. Additionally, immediately following the filing of the instant Motion, Plaintiff will notify Santander that it must file, within three business days, a letter explaining the need to seal or redact the document.

Respectfully submitted,

/s/ Susan Rotkis

cc: Counsel of Record (via ECF)